

1 the station.

2 We were asking them, let's say a year  
3 after they had made previous donation, to make another  
4 one. So in that sense it was like a magazine renewal  
5 subscription you would get in the mail. That's where  
6 the term subscription was coming from.

7 Also then of course, like I said, the  
8 acquiring and then sending out the listener premiums,  
9 the coffee mugs, the commuter mugs, the -- sometimes  
10 we did T-shirts, things like that. So the --  
11 basically taking care of all the functions around the  
12 people who make donations to the station.

13 We -- and that was under that term  
14 subscription coordinator even though my job certainly  
15 had other things to do, other than just the  
16 subscriptions and listener donations.

17 Q Now in terms of being the subscription  
18 coordinator, was it your responsibility to keep track  
19 of all the people who were contributing money to the  
20 radio station?

21 A Yes. As donations came in, we had a  
22 computer database program that we would keep track of

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1 every individual donation so if a Mr. Smith gave \$50,  
2 we would post it effectively on the computer system,  
3 saying Mr. Smith gave \$50 and if Mrs. Jones gave \$100,  
4 we'd go up and put in Mary Jones gave \$100 and so on  
5 and so on, so we could keep a record of every donation  
6 that came in and how much it was and when it came in.

7 Q Was there some relationship between the  
8 amount of money that anybody would contribute and  
9 whether or not they would receive a program guide in  
10 the mail?

11 A Generally our policy was that we would  
12 give a program guide to anyone for -- there was no  
13 minimum to get the program guide.

14 If someone specifically requested not to  
15 get it, then we wouldn't, we would make note of that.  
16 But generally if you made a donation to the station,  
17 you got a program guide -- got on the list to get a  
18 program guide.

19 Q Now when the station -- during that period  
20 of time when the station was identifying you as the  
21 subscription coordinator, did you have any  
22 responsibilities for the station's public inspection

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1 file?

2 A During that time I don't recall having any  
3 responsibilities for the public inspection file.

4 Q Now, I think this'll be more for the  
5 benefit of counsel and I'll relate this information to  
6 you orally and if you need to examine the documents,  
7 that's fine.

8 But in terms of when we compare the summer  
9 and fall 1992 program guides, which are identified as  
10 EB Exhibit 44 in this case, pages 80 and 89, you came  
11 to be identified as the station's operation manager,  
12 apparently sometime during the summer of 1992.

13 Do you have any recollection why it was  
14 that you were given the title of operations manager?

15 MR. DUNCAN: Objection, I don't think he  
16 can talk about why he was -- why others gave him that  
17 title. I think the question could be rephrased to ask  
18 him what he knows about why he thinks he received that  
19 title.

20 JUDGE SIPPEL: Well, it's -- sustained and  
21 rephrase the question. You understand?

22 THE WITNESS: Can -- what's the rephrased

1 question?

2 MR. SHOOK: Okay. The rephrased --

3 JUDGE SIPPEL: The lawyers have cleared  
4 things up again, huh?

5 MR. SHOOK: Yes. Mr. Duncan is just  
6 making sure I follow the rules here.

7 BY MR. SHOOK:

8 Q The question that I have for you is what  
9 is your understanding as to why it was you were  
10 designated as the operations manager, apparently  
11 sometime in the summer of 1992?

12 A At that time, I think it was to clarify  
13 that I was doing more than just being subscriptions  
14 coordinator and the term operations manager as --  
15 sounded a bit more inclusive of other non-subscription  
16 donation things that I was doing at the station.

17 It was just to reflect that -- also the  
18 fact that along with that, that I was now in a -- I  
19 was moved from the clerk/typist position into a  
20 managerial position. He referred -- he was referring  
21 -- he was treating me as a manager rather than a  
22 clerk/typist.

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1           Q     When you say that you were moved to a  
2 managerial position, what position are you referring  
3 to?

4           A     Within the civil service system, San  
5 Francisco Unified School District operates under.  
6 There are positions -- classifications -- job  
7 classification positions. Senior clerk/typist is one  
8 and I think it's called a 14, senior clerk/typist I  
9 believe is called a 1426 if I'm not mistaken. It  
10 might be 1424.

11                     There was a position available called  
12 program manager and Mr. Jacob put me in that position  
13 as opposed to move me into that position and as a  
14 result it was an increase in pay too. I don't recall  
15 what the jump in pay was.

16                     But being managerial, it wasn't covered  
17 for instance, under the -- it wasn't a union position.  
18 It wasn't covered; I wasn't a member of the union  
19 anymore. That's what I recall about it at this point.

20           Q     Did this change in your official job title  
21 from clerk/typist to program manager have any  
22 correlation with the change in your identification and

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1 your program guides from subscription coordinator to  
2 operations manager?

3 A I believe the primarily -- what I can  
4 recall at that time -- it was 1992 or so, that Mr.  
5 Jacob asked me to do -- I remember -- the one thing I  
6 specifically remember is that he asked me to take on  
7 scheduling of announcers.

8 We had to have announcers at the station  
9 seven days a week, 365 days a year, still do and that  
10 was a task that was previously done by Daniel Del  
11 Solar when he was station manager.

12 When Mr. Jacob took Mr. Del Solar's place  
13 that was one of the tasks that I took on and I think  
14 that he was -- I believe that was maybe one of the  
15 things that fit under again -- not under subscriptions  
16 -- it didn't fit under the title of subscriptions  
17 coordinator.

18 Q In terms of scheduling announcers, how  
19 would this process work?

20 A Well, at the station, we have a number of  
21 announcers who are permanent employees and they have  
22 generally regular hours -- regular scheduled hours.

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1 There are other times when there is no regularly  
2 scheduled announcer and at that point I'd need to fill  
3 in with a list of -- we had a number of substitute or  
4 generally referred to as as-needed announcers.

5 So they worked whenever I contacted them  
6 and see if they would -- if they could work a  
7 particular shift. I would do it for those open shifts  
8 or also if one of the regular permanent announcers was  
9 on vacation and I needed to replace them or if they  
10 were sick and needed replacing or if they had a -- it  
11 was a legal holiday and they had the day off, I'd  
12 replace them.

13 I would replace them; I would contact one  
14 of these -- one or more of these as-needed announcers  
15 and see if they could pull the shift.

16 Q The process that you just described, is  
17 that something that basically has been in place since  
18 you started doing this back in, what was it, 1992?

19 A Yes it's very -- it's in place today  
20 still.

21 Q Starting in 1992, when you were the person  
22 who was, I guess, contacting the as-needed announcers,

1 as they were needed, how much discretion did you have  
2 in deciding who it was that you were going to contact?

3 A I pretty much had -- I was left pretty  
4 much with complete discretion. It often though,  
5 depended -- I knew of various people had other jobs  
6 and so they weren't always available. Some people  
7 were only available on weekends; I mean, I knew pretty  
8 much their schedule. Some people were only available  
9 on nights.

10 So often, I would -- if I knew a  
11 particular shift was open, let's say a Saturday  
12 afternoon shift, and I knew somebody wasn't available  
13 on Saturday afternoons because they had a previous  
14 engagement all the time, I wouldn't have even bothered  
15 calling them. So in that sense, it was my discretion  
16 to who -- that I would call.

17 Q When Jerry Jacob was the general manager,  
18 did he ever express to you a preference in terms of  
19 the various people who were available as as-needed  
20 announcers, he would tell you, yes, I like this person  
21 and/or no, I don't like this other person?

22 A I can't recall having specific

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1 conversations where Jerry -- he would say, bring this  
2 person on, don't bring that person on. He pretty much  
3 left it to me.

4 Q Did that situation change at all when Rose  
5 Levinson became general manager?

6 MR. DUNCAN: Objection, what situation are  
7 you talking about?

8 MR. SHOOK: The situation we were just  
9 talking about in terms of the discretion Mr. Helgeson  
10 had for choosing as-needed announcers.

11 THE WITNESS: As far as I could recall,  
12 that situation didn't change as far as, she didn't --  
13 I don't recall her saying one way or another about the  
14 announcers. Again it was left to me.

15 BY MR. SHOOK:  
16 When Jeffery Ramirez became general manager; did you  
17 continue to have the same discretion in terms of  
18 deciding who was going to be chosen as an as-needed  
19 announcer?

20 A Again I was the one who pretty much -- as  
21 I recall, unless I wasn't available for some reason,  
22 on vacation or something, or out of -- some reason not

1 available, I would be the one who would do that  
2 scheduling.

3 Q Now after Mr. Ramirez left, wasn't it the  
4 case that you became the acting general manager of the  
5 station?

6 A There was a period there when Jeff Ramirez  
7 left in, I believe it was the end of January '98, and  
8 he left with rather short notice and so the school  
9 district official, who was overseeing the radio  
10 station at the time, asked me to kind of come in as  
11 the care-taker, keep making sure everything was going  
12 okay, make sure things were running well on a day-to-  
13 day basis for the radio station, until he and whoever  
14 else at the school district headquarters decided how  
15 they were going to fill the Jeff Ramirez position.

16 Q As a consequence of your becoming that  
17 acting general manager or caretaker, as I think you  
18 put it, did you continue to have the responsibility  
19 for scheduling as-needed announcers?

20 A I continued to do that, yes.

21 Q And you --

22 A There wasn't anyone else at the station,

1 I was doing it.

2 Q You couldn't delegate it to anybody else?

3 A I didn't delegate it to anybody else.

4 Q Okay. Now, did there come a time when you  
5 ceased being the acting general manager?

6 MR. DUNCAN: Objection, I don't think  
7 there's any evidence in the record that he was serving  
8 as acting general manager, but what --

9 JUDGE SIPPEL: Well, that's counsel's  
10 characterization.

11 BY MR. SHOOK:

12 Q Are you comfortable with that  
13 characterization?

14 A Well, I would -- like I say, I mean I  
15 considered a stand-in until the state -- the school  
16 district hired a new general manager.

17 MR. DUNCAN: Stand in, stand in general  
18 manager, that's a good term.

19 MR. SHOOK: Whatever term you feel  
20 comfortable with.

21 JUDGE SIPPEL: So your question is?

22 BY MR. SHOOK:

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1 Q So my question is who came in after you  
2 were no longer the stand-in general manager?

3 A At a time in 1998 -- later on in 1998, the  
4 school district official who was overseeing the radio  
5 station at the time, Mr. Boucher, appointed Michael  
6 Johnson to be the station manager. He hired him; he  
7 went through the process of making him the station  
8 manager.

9 Q When Mr. Johnson was station manager, did  
10 you continue to have responsibility for scheduling as-  
11 needed announcers?

12 A As far as I recall, I kept doing that task  
13 of scheduling announcers as needed.

14 Q Did Mr. Johnson have -- did Mr. Johnson  
15 take on any responsibilities for scheduling as-needed  
16 announcers or did he leave that basically to you?

17 A As I recall during that time that he was  
18 station manager, I continued to do the scheduling of  
19 as-needed announcers.

20 Q Did there come a time when Mr. Johnson  
21 left as station manager?

22 A Yes, he did.

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1 Q Approximately when did that take place?

2 A As far as I can remember, it happened in  
3 the fall of 2000.

4 Q Who succeeded Mr. Johnson?

5 A There was a period of time there, it was  
6 very similar to when Mr. Ramirez left, when the school  
7 district official who was overseeing the radio station  
8 at the time -- at the time it was Mr. Thompson, he  
9 requested that I again, take care of the radio  
10 station, make sure things were running on a day-to-day  
11 basis until he and the school district officials hired  
12 a new general -- permanent general manager to replace  
13 Mr. Johnson.

14 Q So there was a period of time when you  
15 were again, for the term that you used before, a  
16 stand-in general manager?

17 A I was standing in for the general manager.

18 Q Approximately how long did that take --  
19 did that go on?

20 A On approximately the 1st of March 2001,  
21 Nicole Sawaya started working at KALW as the general  
22 manager.

1 Q You retained your position as what,  
2 program manager?

3 A As what I consider operations manager.

4 Q Okay. Operations manager in terms of how  
5 you would be identified at the station?

6 A Correct, yes.

7 Q But program manager in terms of how the  
8 civil service would classify you?

9 A As far as official title in the civil  
10 service, yes.

11 Q When Miss Sawaya became the general  
12 manager, did your responsibilities for scheduling as-  
13 needed announcers change?

14 A No. I would say they did not change at  
15 that time. Again, I was doing the scheduling of as-  
16 needed, as necessary.

17 MS. REPP: Excuse me, Your Honor, I know  
18 you mentioned that we were going to break at 11:45.

19 JUDGE SIPPEL: Yes, just -- is this as  
20 convenient for you? Do you have your --

21 MR. SHOOK: I think I'll be able to pick  
22 up where I left off.

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1 JUDGE SIPPEL: Is there a line here you  
2 want to cross?

3 MR. SHOOK: I'm running out of general  
4 managers here.

5 JUDGE SIPPEL: Okay.

6 MR. SHOOK: I'm projecting into the future  
7 now.

8 JUDGE SIPPEL: Okay it's all -- it's ten  
9 of 12:00, we'll be back at quarter of 2:00 by that  
10 clock we use in the back of the room and you're still  
11 under oath, talk to counsel of course, but don't talk  
12 about your testimony to any other witnesses who may be  
13 testifying here today.

14 THE WITNESS: Okay.

15 JUDGE SIPPEL: Or this week, okay?

16 THE WITNESS: Yes.

17 JUDGE SIPPEL: Okay, thank you very much.

18 (Whereupon, the above-entitled matter went  
19 off the record at 11:45 a.m. and resumed at 1:44 p.m.)

20 JUDGE SIPPEL: Okay. The witness has  
21 taken the stand. You're still under oath, Mr.  
22 Helgeson. Do you understand that?

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1 THE WITNESS: Yes, I do.

2 JUDGE SIPPEL: Okay. Go on.

3 BY MR. SHOOK:

4 Q Mr. Helgeson, after becoming known as the  
5 station's operations manager, which we seem to have  
6 established that took place sometime in the early  
7 '90's, roughly 1992 when Jerry Jacob was general  
8 manager, did you have any on-air responsibilities?

9 A I would say I had no on-air  
10 responsibilities in the sense of, I was speaking on  
11 the air --

12 Q Correct. Right.

13 A By being on-air responsibilities? The  
14 answer to that would be no.

15 Q Did there ever come a time when you did  
16 have on-air responsibilities?

17 A As far as being on the radio and speaking  
18 on the radio, I've hardly ever spoken on the radio.

19 Q There have been occasions though?

20 A I can remember only, I think, maybe just -  
21 - over the years, I can't give you a specific.  
22 Speaking, say during an on-air fund drive and maybe

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1 giving out the telephone number or something like  
2 that.

3 Q Now, when I asked the question -- when I  
4 asked my first question, you seemed to hesitate a bit,  
5 was there some responsibility that you had that was  
6 connected with the on-air operation of the station?

7 A There are elements of the job that I was  
8 doing, and do, regarding making sure that certain  
9 radio programs were available to run on the air and  
10 again, there was the matter of scheduling on-air  
11 announcers as needed and certain things had to be read  
12 on the air, sometimes I'd be involved with that.

13 So I was involved in that sense, as I can  
14 recall, with being on-air, but I would -- you might --  
15 be construed as on-air responsibilities without  
16 actually being on the air myself.

17 Q With respect to the first thing that you  
18 mentioned, were you involved in obtaining programming  
19 in some fashion?

20 A Well, I was not the one making, say,  
21 programming decisions. One of the things I would be  
22 involved with was in some of the shows -- most of the

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1 programs actually, I would say at the radio station,  
2 were not actually produced at the radio station, but  
3 came from other sources, often over -- via satellite  
4 delivery, such as programs from National Public Radio  
5 and other national distributors and sometimes they  
6 even came in the mail.

7 Sometimes if we didn't get those feeds of  
8 those programs, sometimes they were recorded -- came  
9 in at one time and then played, delayed and played  
10 back at another time. Perhaps, if, for some reason --  
11 for some technical reason or human reason that  
12 recording didn't get made, I'd have to do what I  
13 needed to do to get a copy of that show so we'd have  
14 it to air.

15 Q Were you involved in -- well, once you  
16 became the station's operations manager, were you  
17 involved in scheduling programming?

18 A As far as making schedules of programs,  
19 that was something that was up to the general manager  
20 of the station and choosing which programs we would  
21 air and at what time they would air and their regular  
22 schedule. That would be the general manager's

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1 responsibility.

2 Q Would that decision of the general manager  
3 be communicated with you in some fashion for  
4 implementation?

5 A Well, certainly since I was involved in,  
6 for instance, putting together copy for the program  
7 guide, I'd need to know if a particular show was going  
8 to be on now at ten o'clock on Wednesdays or if we  
9 were going to make a programming change for something  
10 or at a particular time.

11 Q Now, as we understand it, the programming  
12 guides came out or come out, I guess, what, every  
13 three months?

14 A Yes, they are quarterly program guides and  
15 they come out quarterly -- four times a year. So,  
16 first one -- one would cover January through March,  
17 one would cover April approximately through June, one  
18 would cover July through September and then one would  
19 cover October through December.

20 Although, once in a while you might see  
21 something, for instance, that would might over --  
22 might go over a week or two. So, in the October

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1 through December one, you might actually see something  
2 about something that's happening on January 1st or 2nd  
3 -- like that.

4 But it was approximately on the quarterly  
5 -- a program guide would cover a quarter of the year.

6 Q What role, if any, did you have in putting  
7 the program guide together?

8 A My job has been to get the copy together  
9 and collect all -- whatever copy, work with the  
10 general manager, see what copy we have for the program  
11 guide and get as much as -- get it as complete as we  
12 wanted it to be. Work with the general manager as far  
13 as deciding what copy would go in and deliver that  
14 copy to -- we have an outside vendor that would  
15 actually do the layout of the program guide for us and  
16 then that vendor also handles the printing of it,  
17 binding, stitching, so on and then also addressing it  
18 and sending -- using the list of names and addresses  
19 that we would provide, handle the mailing of it,  
20 taking it to the post office, completely.

21 So my job was about collecting the copy  
22 that should go in and creating some copy of some copy

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1 if I needed to find information about a radio show,  
2 I'd perhaps go to a -- call up a producer and see what  
3 information I could find about it.

4 Q Now, approximately when did you start to  
5 become involved in preparing the program guides?

6 A I can't recall an exact date. I would say  
7 early in the time I was there. Probably from the time  
8 of Mr. Del Solar being there and I was -- started  
9 being involved with it.

10 Q Has your role changed over time?

11 A It's changed over time to where I took on  
12 what I -- what seemed over time to be doing more of it  
13 and creating more of it. Often, what we're doing,  
14 we're just -- was updating, taking information about  
15 a radio show from one program guide and looking at it  
16 to make sure it still was accurate and maybe  
17 reprinting in the next copy of the program guide, but  
18 making sure it was still accurate.

19 So, I was involved with quite a bit --  
20 with a significant amount of it, again with input from  
21 general manager and so on. I would have to say  
22 lately, and by lately I mean the last year or so,

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1 someone else at the station has been helping because  
2 of my vision problem. It's a little bit harder for me  
3 to do the extent that I was doing and so I haven't  
4 been doing quite as much.

5 Although, I -- on the program guide that  
6 we're currently producing, I still provided some of  
7 the copy.

8 Q Before the onset of your vision problem,  
9 over what period of time, roughly, would you say that  
10 your role in preparing the program guide has been  
11 pretty much the same?

12 A I would say since the time, if I went  
13 back, since up to the time of my vision problem a year  
14 or so ago. Looking back, I'd have to say the early  
15 '90's. I can't think of -- I'm trying to think of who  
16 else might have done a more significant amount than I  
17 did.

18 But I think it certainly, in the early  
19 '90's, but I can't give you an exact date. It seems  
20 like it's been a -- again, it's on a quarterly basis.  
21 Sometime around the early '90's perhaps.

22 Q Typically from the time the process of

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1 preparing the program guide started until it was  
2 actually delivered to the printer, about how much time  
3 would elapse?

4 A I would have to say less than a month. A  
5 couple of -- I'm thinking from the time we started  
6 delivering -- putting together copy and at the  
7 station. Nowadays, of course, it's pretty much all  
8 done on computer. To the time we start delivering it  
9 to the layout and printing. I'm thinking about maybe  
10 in a range -- two and half, three, four weeks maybe.

11 Q About how much time before the program  
12 guide became current, would the program guide actually  
13 be sent to the persons on the mailing list?

14 A It would be -- what we tried to do was get  
15 it out, for instance, an issue that would print that  
16 would for instance be in the summer, covering July,  
17 August and September, we would often try to get out  
18 mid-June, maybe sometime mid-June, the 20th of June,  
19 something like that. So, approximately ten days,  
20 maybe two weeks before a quarter began.

21 Q Now, in conjunction with your being named  
22 the operations manager, did you have any role in

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1 connection with the station's annual budget?

2 A I can recall being asked by the general  
3 manager for, at the time periodically asked -- you  
4 know, how much are we spending on something specific  
5 around the radio station and certainly I would collect  
6 that information from records I kept in my private  
7 files at the station or maybe I'd contact somebody at  
8 the school district accounting department and provide  
9 that to the general manager.

10 Q Did your role with respect to the  
11 station's annual budget ever change?

12 A I would say that my role regarding the  
13 budget has always been to work with the general  
14 manager on that. Again, providing them with whatever  
15 data they want or looking forward to our next fiscal  
16 year, you know, how much are we going to need to spend  
17 on certain line items, and again, how much money are  
18 we going to bring in, too.

19 That certainly makes a -- that makes a --  
20 matters when you're making out budgets, too. So,  
21 again, it was working for the general manager,  
22 providing them with information that I could -- and I

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1 still am doing that.

2 Q Are you able to tell us how much money the  
3 station has brought in from donors during each of the  
4 last three fiscal years?

5 A I don't have that information in front of  
6 me, but that information would be available if I was  
7 at the station now.

8 Q Well, let's just think about the last  
9 fiscal year. Is that a set of figures that at one  
10 time at least you were familiar with?

11 A From the last fiscal year, which would  
12 have been fiscal '04, which would cover the fiscal  
13 year and -- we have a July through June fiscal year at  
14 the radio station and so the last fiscal year would  
15 have ended June 30th of last year, which would have  
16 been June 30th of 2004.

17 Listener donations would have been -- I  
18 haven't looked at -- it's been a while since I've  
19 looked at those numbers, but it would be in the range  
20 of about three quarters of a million dollars, maybe  
21 \$800,000.

22 Q And this is a figure that has increased

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